



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
75 Hawthorne Street  
San Francisco, CA 94105

**VIA FEDERAL EXPRESS**

August 12, 2014

**EPA CERCLA Section 104(e) Request for Information**

Timothy C. Cronin, Esq.  
Dennis J. Byrne, Esq.  
For Pearl Rosenthal, Trustee, Rosenthal Family Trust Dated June 3, 1989  
The Cronin Law Group  
744 Montgomery Street, 2nd Floor  
San Francisco, CA 94111

Re: Supplemental 104 (e) Request for Information Related to Omega Chemical Corporation  
Superfund Site; Angeles Chemical Co., Inc. facility, 8915 Sorensen Avenue, Santa Fe  
Springs, CA

Dear Messrs. Cronin and Byrne:

We have received and reviewed your February 14, 2014 partial response to the United States Environmental Protection Agency's ("EPA") information request issued to your client, the Rosenthal Family Trust dated June 3, 1989, (the "Rosenthal Trust") pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. Section 9604(e). The term "Rosenthal Trust" as used herein is intended to encompass the Estate of Arnold Rosenthal, as well. The Rosenthal Trust's response acknowledged that a Statement of Net Worth and a recent tax return were being prepared and would be provided to EPA separately, in a supplemental response. As of today's date, we have not been provided with any such documentation. Specifically, the Rosenthal Trust has not provided answers to Questions 3 and 4 on Enclosure B of the November 27, 2013 request:

3. Provide a copy of the personal federal income tax return (IRS Form 1040) for the most recent year, as filed with the Internal Revenue Service, complete with all schedules and attachments.
4. Complete the form entitled "Enclosure C: Statement of Net Worth" (enclosed).

**This information was due on February 14, 2014.** Please be advised that EPA has sought the assistance of United States Department of Justice counsel to address this matter. Please also be reminded that your client's compliance with this information request is mandatory.

Continued failure to comply with EPA's information request, or to adequately justify such failure to respond, may subject you to an enforcement action seeking to compel compliance and collect penalties of up to \$37,500 per day of noncompliance pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. §9604(e)(5).

If there is certain responsive information that you are unable to provide at this time for any reason, please let us know immediately.

### **Supplemental Information Request**

Based on our review of the Rosenthal Trust's incomplete February 14, 2014 response, and our further investigation of the Site, we believe the Rosenthal Trust may have additional information that may assist EPA in its investigation of the Site. Consequently, we are hereby requesting the following additional information from the Rosenthal Trust. Please be aware that these additional questions do not extend the timeframe for your client's response to EPA's November 27, 2013 information request, as described above.

1. Please provide the details and terms of the settlement agreed upon between the Rosenthal Trust and Fireman's Fund Insurance Company and Great American Insurance Company in October of 2009 referenced in your February 14, 2014 Section 104(e) response. State the amount of money received by the Rosenthal Trust or by any other recipient on its behalf. Provide information as to how the settlement proceeds have been spent or are planned to be used. With regard to any remaining settlement funds, identify the individuals and/or entities that were involved in the settlement, including which were recipients of any amounts of money, the amount(s) allocated, and provide information as to how the settlement proceeds have been spent or are planned to be used. Provide any documents setting forth or relating to the settlement agreement.
2. Did the Rosenthal Trust receive any settlement proceeds from any other insurance company/ies as part of the 2009 settlement or in any way related to the Property? If so, identify the individuals and/or entities that were involved in the settlement, including which were recipients of any amounts of money, the amount(s) allocated, and provide information as to how the settlement proceeds have been spent or are planned to be used. Provide any documents setting forth or relating to the settlement agreement.
3. In EPA's November 27, 2013 Information Requests, we requested information about the settlement in the matter of Angeles Chemical Co., Inc., et al. v. McKesson Corp., et al. (see, e.g., Question 5, Enclosure B, the Rosenthal Trust 104(e) Information Request). As we noted in that question, EPA has information indicating that a portion of the settlement proceeds were allocated for the benefit of the Rosenthal Trust.

Page 26 of the transcript that you provided with your February 2014 Section 104(e) response suggests that \$750,000 was placed into an interest-bearing escrow account for the "Berg parties and Rosenthals" (lines 17-25). Please state the amount that the Rosenthal Trust received of the money referenced in this transcript excerpt. State the amount that each of the Berg and Rosenthal parties received from the allocation and provide information as to how the settlement proceeds have been spent or are planned to

be used. Regarding the remaining settlement proceeds, state which individuals and/or entities were recipients, the amount(s) allocated, and provide information as to how the settlement proceeds have been spent or are planned to be used.

4. Did the Rosenthal Trust receive any proceeds from any other party involved in the 2009 settlement or in any way related to the Property? If so, identify the individuals and/or entities that were involved in the settlement, including which were recipients of any amounts of money, the amount(s) allocated, and provide information as to how the settlement proceeds have been spent or are planned to be used. Provide any documents setting forth or relating to the settlement agreement.

EPA has the authority to request this information pursuant to Section 104(e) of CERCLA, 42 U.S.C. Section 9604(e). Failure to respond fully and truthfully to this request may result in civil actions and penalties.

Please refer to our November 27, 2013 Request for Information (enclosed) for instructions with respect to your response, including instructions as to the assertion of a business confidentiality claim and the determination of the scope of our request. Those instructions continue to apply and are hereby incorporated into this Supplemental Request for Information. **Please provide your response to the Supplemental Request for Information, in writing, within two weeks of the date this letter is received.** Your response should be directed to:

Keith Olinger, SFD-7-5  
U.S. Environmental Protection Agency, Region IX  
Superfund Division  
75 Hawthorne Street  
San Francisco, California 94105

If you have questions regarding this matter, please contact Steve Berninger, Assistant Regional Counsel, at (415) 972-3909, or Keith Olinger, Enforcement Officer, at (415) 972-3125. If you have questions about the nature of the environmental conditions at the Site, or the status of cleanup activities, please contact Wayne Praskins at (415) 972-3181.

We appreciate and look forward to your prompt response to this Information Request.

Sincerely,



Kathi Moore, Manager  
Case Development/Cost Recovery Section  
Site Cleanup Branch  
Superfund Division

Enclosure:

- November 27, 2013 Request for Information

cc (w/o enc.):

Steve Berninger, EPA  
Wayne Praskins, EPA  
Keith Olinger, EPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

**VIA FEDERAL EXPRESS**

November 27, 2013

**EPA CERCLA Section 104(e) Request for Information**

Timothy Cronin, Esq.  
For Pearl Rosenthal, Trustee, Rosenthal Family Trust  
Law Offices of Timothy C. Cronin  
744 Montgomery Street, 2<sup>nd</sup> Floor  
San Francisco, CA 94111

Re: 104 (e) Request for Information – Omega Superfund Site  
Angeles Chemical Co., Inc. Facility, 8915 Sorensen Avenue, Santa Fe Springs, CA

Dear Mr. Cronin:

The United States Environmental Protection Agency ("EPA") is spending public funds to investigate and respond to the release or threatened release of hazardous substances into the soil and groundwater at the Omega Chemical Superfund Site (the "Site"). EPA previously issued Rosenthal Family Trust Dated June 3, 1989 a General Notice for the real property located at 8915 Sorensen Avenue, Santa Fe Springs, CA under the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), as amended, 42 U.S.C. §9601 *et seq.* The purpose of this letter is to obtain updated information on Rosenthal Family Trust Dated June 3, 1989's current ability to pay for or perform future work.

We request that you provide a complete and truthful written response to this Information Request and questions in Enclosure B **within thirty (30) calendar days** of your receipt of this letter. Instructions on how to respond to the questions are described in Enclosure A. Please return your written response to:

Keith Olinger, SFD-7-5  
U.S. Environmental Protection Agency, Region IX  
Superfund Division  
75 Hawthorne Street  
San Francisco, California 94105

Under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. §9604(e), EPA has broad information-gathering authority which allows EPA to require persons to furnish information or documents relating to:

- (a) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility;
- (b) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility; and
- (c) Information relating to the ability of a person to pay for or perform a cleanup.

Please note that your compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in an enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. §9604(e)(5). This statutory provision authorizes EPA to seek the imposition of penalties of up to \$37,500 per day of noncompliance. Please be further advised that provision of false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. §1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

Some of the information EPA is requesting may be considered by you to be confidential business information (“CBI”), as described in Title 40 of the Code of Federal Regulations, Subchapter A, Part 2, Subpart B (40 C.F.R., §2.201, *et seq.*). Please be aware that you may not withhold the information upon that basis. If you wish EPA to treat the information confidentially, you must advise EPA of that fact by following the procedures outlined in Enclosure A, including the requirement for supporting your claim for confidentiality. Please be aware that EPA will maintain information consistent with the Privacy Act of 1974, 5 U.S.C. §552a, as amended.

This request for information is not subject to review by the Office of Management and Budget (“OMB”) under the Paperwork Reduction Act because it is not an “information collection request” within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). See also 5 C.F.R. §§1320.3(c), 1320.4, and 1320.6(a). Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons. 44 U.S.C. §3502(4), (11); 5 C.F.R. §§1320.4 and 1320.6(a).

If you have questions regarding this Information Request, please contact Steve Berninger, Assistant Regional Counsel, at (415) 972-3909, or Keith Olinger, Enforcement Officer, at (415) 972-3125. If you have questions about the history of the Site, the nature of the environmental conditions at the Site, or the status of cleanup activities, please contact Lynda Deschambault at (415) 947-4183.

We appreciate and look forward to your prompt response to this Information Request.

Sincerely,

A handwritten signature in cursive script that reads "Kathi Moore". The signature is written in dark ink and is positioned above the printed name.

Kathi Moore, Manager  
Case Development/Cost Recovery Section  
Site Cleanup Branch  
Superfund Division

Enclosures (3):

- Enclosure A (Instructions and Definitions)
- Enclosure B (Information Request)
- Enclosure C (Statement of Net Worth)

cc: Steve Berninger, EPA  
Lynda Deschambault, EPA  
Keith Olinger, EPA

## ENCLOSURE A: INSTRUCTIONS AND DEFINITIONS

### Instructions:

1. Answer Each Question Completely. A separate response must be made to each of the questions set forth in this Information Request. For each question contained in this letter, if information responsive to this Information Request is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained. For the definition of “you” and other terms, please see the Definitions section below.
2. Number Each Answer. When answering the questions in Enclosure B, please precede each answer with the corresponding number of the question and subpart to which it responds.
3. Number Each Document. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the question to which it corresponds.
4. Provide the Best Information Available. Provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.
5. Identify Sources of Answer. For each question, identify all the persons and documents that you relied on in producing your answer.
6. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA.
7. Scope of Request. The scope of this request includes all information and documents independently developed or obtained by research on the part of your company, its attorneys, consultants or any of their agents, consultants or employees.
8. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b). If you make a claim of confidentiality for any of the information you submit to EPA, you must prove that claim. For each document or response you claim confidential, you must separately address the following points:

- a. clearly identify the portions of the information alleged to be entitled to confidential treatment;
  - b. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
  - c. measures taken by you to guard against the undesired disclosure of the information to others;
  - d. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
  - e. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
  - f. whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.
  - g. To make a confidentiality claim, please stamp, or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all nonconfidential information, including any redacted versions of documents are in one envelope and all materials for which you desire confidential treatment are in another envelope.
  - h. All confidentiality claims are subject to EPA verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to you.
9. Disclosure to EPA's Authorized Representatives. Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. 2.310(h), even if you assert that all or part of it is confidential business information. The authorized representatives of EPA to which EPA may disclose information contained in your response are as follows:

Department of Toxic Substances Control/  
California Environmental Protection Agency

ENCLOSURE A

Toeroek Associates, Inc.  
EPA Contract Number EP-BPA-11-W-001

CH2M Hill, Inc.  
EPA RAC Contract Number EP-S9-08-04

Toeroek Herndon Joint Venture  
EPA Contract Number EP-R9-12-02

ITSI, Inc.  
EPA RAC Contract Number EP-S9-08-03

Techlaw  
EPA ROC Contract Number EP-W-07-066

CB&I / Shaw Environmental & Infrastructure, Inc.  
EPA RAC Contract Number EP-S9-13-02

Any subsequent additions or changes in EPA contractors who may have access to your response to this Information Request will be published in the Federal Register.

This information may be made available to these authorized representatives of EPA for any of the following reasons: to assist with document handling, inventory, and indexing; to assist with document review and analysis for verification of completeness; or to provide expert technical review of the contents of the response. Pursuant to 40 C.F.R. §2.310(h), you may submit comments on EPA's disclosure of any confidential information contained in your response by EPA to its authorized representatives along with the response itself, within the thirty (30) calendar day period in which the response is due.

10. Objections to Questions. If you have objections to some or all of the questions contained in the Information Request letter, you are still required to respond to each of the questions.

Definitions:

1. The term “you” or “Respondent” should be interpreted to include the addressee of this Information Request, and its officers, managers, employees, contractors, trustees, successors, assigns and agents.
2. The term “person” shall include any individual, firm, unincorporated association, partnership, corporation, trust, joint venture, or other entity.
3. The term “waste” or “wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge.

4. The term “hazardous waste” shall have the same definition as that contained in Section 1004(5) of RCRA.
5. The term “hazardous substance” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
6. The term “release” has the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.
7. The term “pollutant or contaminant” shall have the same definition as that contained in Section 101(33) of CERCLA and include any mixtures of such pollutants and contaminants with any other substance including petroleum products.
8. The term “materials” shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site including, but not limited to, all hazardous substances, pollutants or contaminants.
9. The term “document” includes any written, recorded, computer generated or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.

## ENCLOSURE B: QUESTIONS (INFORMATION REQUEST)

**Note: The term Property refers to the property located at 8915 Sorensen Avenue, Santa Fe Springs, California.**

1. State the full legal name, address, telephone number, positions(s) held by, and tenure of, the individual(s) answering any of these questions on behalf of Rosenthal Family Trust Dated June 3, 1989 concerning the matters set forth herein.
2. Identify and provide copies of all property, pollution, casualty, environmental and/or liability insurance policies, and any other insurance contracts referencing the Property or facilities located at the Property, held by Rosenthal Family Trust Dated June 3, 1989 from the time Rosenthal Family Trust Dated June 3, 1989 assumed ownership of the Property until the present. In identifying such policies, state:
  - a. The name and address of each insurer and of the insured;
  - b. The type of policy and policy numbers;
  - c. The effective dates for each policy;
  - d. The per occurrence policy limits of each policy;
  - e. A description of the insured's efforts to file any claims relating to soil and/or groundwater contamination at the Property, under each policy, as well as the outcome of such efforts; and
  - f. Identify all insurance brokers or agents who placed insurance for Rosenthal Family Trust Dated June 3, 1989 at any time during the investigation period you identify above. Identify by name and title, if known, individuals at the agency or brokerage most familiar with your property, pollution and/or liability insurance program and the current whereabouts of each individual, if known.
3. Provide a copy of the federal income tax return (IRS Form 1040) for the most recent year, as filed with the Internal Revenue Service, complete with all schedules and attachments.
4. Complete the form entitled "Enclosure C: Statement of Net Worth" (enclosed).
5. EPA information indicates that in the matter of Angeles Chemical Co., Inc., et al. v. McKesson Corp., et. al. a \$4.55 million settlement was agreed to between the parties as set forth in a Settlement Agreement effective January 5, 2010. EPA information also indicates that a portion of the settlement proceeds were allocated for the benefit of Rosenthal Family Trust Dated June 3, 1989. State the amount Rosenthal Family Trust Dated June 3, 1989 received from the allocation of settlement proceeds and provide information as to how the settlement proceeds have been spent or are planned to be used. Regarding the remaining settlement proceeds, state which individuals and/or entities were

recipients, the amount(s) allocated, and provide information as to how the settlement proceeds have been spent or are planned to be used.

6. Describe any agreement, whether written or verbal, to which Rosenthal Family Trust Dated June 3, 1989 is a party concerning the environmental conditions, cleanup or remediation of the Property. Include a description of any ongoing obligations related to the Property. As part of your response, describe each part of the agreement not in writing; provide the name, address and telephone number of each person agreeing to that provision; and provide the date that part of the agreement was made. Provide any documents evidencing such an agreement.

## ENCLOSURE C: STATEMENT OF NET WORTH

Please provide the following information to the best of your ability. Data should be as current as possible. Estimates are acceptable; please note all estimates with an "E".

If you are the sole proprietor of a business, please list business assets and liabilities in addition to personal assets and liabilities. Please list the business assets and liabilities on a separate form.

### 1. BANK ACCOUNTS (Checking, NOW, Savings, Money Market, CDs etc.)

Describe and state ownership and value of any account or shares held by (1) you, (2) your spouse, (3) your dependents, or (4) anyone on your behalf in any bank, building and loan association, saving institution, cooperative, or credit union.

Name and Address of Bank or Institution	Type of Account	Current Balance
1.		
2.		
3.		
4.		
5.		
For Agency Use only - Total Current Balance in Bank Accounts		

### 2. INVESTMENTS (Stock, Bonds, Mutual Funds, Options, Futures, Real Estate Investment trusts, etc.)

Investment	Number of Shares or Units	Current Market Value
1.		
2.		
3.		
4.		
5.		
For Agency Use Only - Total Estimated Market Value of Investments		

### 3. RETIREMENT FUNDS AND ACCOUNTS (IRA, 401(k), Keogh, vested interest in company retirement)

Description of Account	Estimated Market Value
1.	
2.	
3.	
4.	
For Agency Use Only - Total Estimated Value of Retirement Funds and Accounts	

**4. LIFE INSURANCE POLICIES (Whole Life, Universal Life, etc.)**

State the names and address of all insurers with whom you have policies of life or accident insurance; give the date, face value, and cash surrender value of each policy, and specify which policies are payable to your estate.

Policy Holder	Issuing Company	Policy Value	Cash Value
1.			
2.			
3.			
4.			
5.			
For Agency Use Only - Total Value of Life Insurance Policies			

**5a. VEHICLES USED FOR COMMUTING PURPOSES ONLY**

Brand and Model	Year	Estimated Market Value
1.		
2.		
For Agency Use Only - Total Estimated Market Value of Vehicles		

**5b. OTHER VEHICLES (Cars, Trucks, Motorcycles, Motor Homes, Trailers, Boats, Airplanes, etc.)**

Brand and Model	Year	Estimated Market Value
1.		
2.		
3.		
4.		
For Agency Use Only - Total Estimated Market Value of Vehicles		

**6. Personal Property (Describe the Household Goods and Furniture, Jewelry, Art, Antiques, Collections, Precious Metals, etc. valued at \$ 1000 or more per item or \$ 5000 or more in the aggregate owned by (1) you, (2) your spouse, or (3) your dependents.**

Type of Property	Estimated Market Value
1.	
2.	
3.	
4.	
5.	
For Agency Use Only - Total Estimated Market Value of Personal Property	

**7a. REAL ESTATE - PRIMARY RESIDENCE (Home-List only one such residence)**

Location	Legal Description of Property	Estimated Market Value

**7b. OTHER REAL ESTATE (Land, Buildings, Land with Buildings, Mineral Rights)**

Location	Legal Description of Property	Estimated Market Value
1.		
2.		
3.		
4.		
5.		
For Agency Use Only - Total Estimated Market Value of Real Estate		

**8. OTHER ASSETS**

8a. Have you made or do you hold or own, or have a lien upon, any claim by suit or otherwise against the United States or any other party?

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8b. (i) Do you have any vested or contingent future interest in any property, or to the payment of any money, for any reason whatsoever?

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(ii) If so, state the nature and source of such interest, the location of the property, the identity and address of any person or institution that may be involved, the circumstances that will cause the property or money to inure to your benefit, and the probable value or amount thereof.

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8c. (i) Is any money or property held in trust for (1) you, (2) your spouse, or (3) your dependents?

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(ii) If so, state the name and address of the trustee or other fiduciary, identify the trust, state what monies or property are held in trust, the value thereof, and the date upon which the trust is to terminate.

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8d. If any monies or property are held in trust for (1) you, (2) your spouse, or (3) your dependents, state the amount of income which is or may be received there from, the timing of such payments, give the value of the corpus of trust which may be distributed to (1) you, (2) your spouse, or (3) your dependents, and the expected date of distribution.

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8e. What other sources of income or property, actual or potential do (1) you, (2) your spouse, or (3) your dependents have which you have not disclosed in answer to previous questions, and what is the value thereof?

Type of Asset	Estimated Market Value
1.	
2.	
3.	
4.	
5.	
For Agency Use Only - Total Other Assets	

## 9. CREDIT CARDS AND LINES OF CREDIT

Credit Card/Line of Credit (Type)	Owed To	Balance Due
1.		
2.		
3.		
4.		
5.		
6.		
For Agency Use Only - Total Balance Due on Credit cards and Lines of Credit		

## 10. VEHICLE LOANS (Cars, Trucks, Motorcycles, Motor Homes, Travel Trailers, Airplanes, etc.)

Vehicle (Model and Year)	Owed To	Balance Due	Start Date	End Date
1.				
2.				
3.				
4.				
For Agency Use Only - Total Balance Due on Vehicle Loans				

## 11. FURNITURE AND HOUSEHOLD GOODS LOANS

Type of Loan	Owed To	Balance Due	Start Date	End Date
1.				
2.				
3.				
4.				
For Agency Use Only - Total Balance Due - Furniture & Hhg Loans				

## 12. MORTGAGES AND REAL ESTATE LOANS

Type of Loan	Owed To	Property Secured Against	Balance Due	Start Date	End Date
1.					
2.					
3.					
4.					
For Agency Use Only - Total Balance Due - Mortgages and Real Estate loans					

**13. OTHER DEBT (Amounts due to individuals, Fixed Obligations, Taxes Owed, Overdue Alimony Child Support, etc.)**

13a. Are any suits or judgments pending against you?

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13b If so, state the full details, including the dates and amounts of recent payments thereon made for you and whether your salary has been garnished and by whom.

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Type of Debt	Owed To	Balance Due	Start Date	End Date
1.				
2.				
3.				
4.				
5.				
For Agency use only - Total Balance Due on Other Debt				



December 3, 2013

Dear Customer:

The following is the proof-of-delivery for tracking number **546221781583**.

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**Delivery Information:**

<b>Status:</b>	Delivered	<b>Delivered to:</b>	Receptionist/Front Desk
<b>Signed for by:</b>	K.KAREN	<b>Delivery location:</b>	744 MONTGOMERY ST FL 2 SAN FRANCISCO, CA 94111
<b>Service type:</b>	FedEx Priority Overnight	<b>Delivery date:</b>	Dec 2, 2013 08:55
<b>Special Handling:</b>	Deliver Weekday  Direct Signature Required		

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**Shipping Information:**

<b>Tracking number:</b>	546221781583	<b>Ship date:</b>	Nov 27, 2013
		<b>Weight:</b>	0.5 lbs/0.2 kg

**Recipient:**

Timothy Cronin, Esq.  
Law Offices of Timothy C. Cronin  
for Pearl Rosenthal, Trustee  
744 Montgomery St., 2nd Floor  
SAN FRANCISCO, CA 94111 US

**Reference****Shipper:**

Omega  
Toeroek Associates, Inc.  
1300 Clay Street  
Suite 450  
Oakland, CA 94612 US  
9063-006

Thank you for choosing FedEx.



December 17, 2014

Dear Customer:

The following is the proof-of-delivery for tracking number **594833002357**.

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**Delivery Information:**

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<b>Status:</b>	Delivered	<b>Delivery location:</b>	744 MONTGOMERY ST 2 SAN FRANCISCO, CA 94111
<b>Signed for by:</b>	.BAR	<b>Delivery date:</b>	Aug 13, 2014 09:41
<b>Service type:</b>	FedEx Priority Overnight		
<b>Special Handling:</b>	Deliver Weekday		
	Direct Signature Required		



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**Shipping Information:**

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<b>Tracking number:</b>	594833002357	<b>Ship date:</b>	Aug 12, 2014
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**Recipient:**

Timothy C. Cronin, Esq.  
The Cronin Law Group  
744 Montgomery Street  
2nd Floor  
SAN FRANCISCO, CA 94111 US

**Reference****Shipper:**

Omega  
Toeroek Associates, Inc.  
1300 Clay Street  
Suite 450  
OAKLAND, CA 94612 US  
9063-006

Thank you for choosing FedEx.